

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MELINDA SERIN, JUDSON RUSS, LONG SOU
LIM, PERI KETTLER, GORDON REDNER, AND
THOMAS J. SMITH,

Plaintiffs,

-against-

NORTHERN LEASING SYSTEMS, INC., JAY
COHEN, RICH HAHN, and SARA KRIEGER,

Defendants.
----- X

06 CV 01625 (JSG)

DECLARATION OF
MAURA R. GROSSMAN,
ESQ.

I, Maura R. Grossman, Esq., an attorney licensed to practice in the state of New York, make the following declaration:

1. I am an attorney licensed in the state of New York, am admitted to practice in this Court, and am Counsel at Wachtell, Lipton, Rosen & Katz in New York, NY. My firm primarily practices in the area of complex corporate transactions and corporate litigation. My own practice is focused on advising lawyers and clients on legal, technical, and strategic issues involving electronic discovery and information management, both domestically and abroad, as well as on matters of legal ethics. Many of the matters I am involved with involve millions of pages of documents.
2. I have been asked to provide this declaration in support of the fee application for various attorneys of Finkelstein & Partners of 1279 Route 300, Newburgh, NY 12551.
3. I have known Keith Altman for the past four years. I am actively involved in The Sedona Conference®, and I am a member of its Working Group on Electronic Document Retention

and Production (“WG1”). Mr. Altman is also a member of WG1. I have known him to be an active participant on behalf of requesting parties. He has spoken at various meetings and has been on the drafting teams of several Sedona publications.

4. I am generally familiar with civil RICO actions such as *Serin v. NLS*. As such, I have a general understanding of the level of advocacy required to undertake such matters. I am generally familiar with Mr. Altman's activities in the above matter and find his activities to be consistent with the needs of such a case. Based on my experience with him in WG1, I have found him to be honest and efficient in his work habits, and I have no reason to believe that the amount of time he expended in his activities in this case is likely to be greater than what is typically required for those activities.
5. I have also reviewed the Finkelstein firm's rate of \$425 per hour and it is my opinion that such a rate is consistent with rates charged for similar work in New York.

I declare under penalties of perjury that the foregoing statement is true and correct to the best of my knowledge.

Dated: December 31, 2010
New York, NY

/s Maura R. Grossman
Maura R. Grossman, Esq.
Wachtell, Lipton, Rosen & Katz
51 West 52nd Street
New York, New York 10019
212-403-1391
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**DECLARATION OF
DONALD EDGAR, ESQ.**

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I, Donald Edgar, Esq. , an attorney licensed to practice in the state of California, make the
following declaration:

1. I am an attorney licensed in the state of California and I am the managing partner of the
Edgar Law Firm in Santa Rosa, CA. I am admitted to practice before all the State and
Federal District Courts of California, and am currently admitted *pro hac vice* in New York,
New Jersey, and Arizona. I primarily practice in the areas of complex mass tort
pharmaceutical cases and class actions.
2. I have been asked to provide this declaration in support of the fee application for various
attorneys of Finkelstein & Partners of 1279 Route 300, Newburgh, NY 12551.
3. I have known Keith Altman for more than 10 years and have worked with him in several
different complex litigations both before and after he was licensed as an attorney. He has
consulted with me in many other attorneys involved in these litigations and has played
various important roles in the litigation of several MDLs and complex cases.

4. Most recently, I have worked with him in the Neurontin litigation, MDL 1629, venued in the district of Massachusetts since 2004. In this litigation, he has been the individual responsible for coordinating the document discovery in which several million pages of documents were received. He had primary responsibility for establishing the document review protocol and insuring that documents were available for use by all of the attorneys litigating the case. In terms of preparing for trial, Keith had primary responsibility for determining the most important materials for use during trial and for preparing the exhibits and video depositions for use during the trial. He has also taken and defended depositions as well as argued Daubert motions in the case.
5. I also currently have cases pending in the Byetta (pharmaceutical drug) coordinated proceeding pending in Los Angeles. Mr. Altman has taken a lead role in the complex and voluminous discovery issues on behalf of the consortium of plaintiffs' counsel.
6. I have known Mr. Altman for several years before he became licensed, utilized his services as a document and data discovery and analysis expert, and served as a mentor during his law school education.
7. Mr. Altman's considerable work in litigation-related matters including document and data discovery, data analysis, and litigation evidence management render his skills in these areas to exceed that of well-seasoned complex litigators. Despite his few years of formal practice as a licensed attorney, his legal skills, in many areas, exceed those of attorneys with more than 10 years of experience.
8. In my view, it is remarkable that Mr. Altman was able to complete law school in his "spare time" given the breadth of his simultaneous litigation responsibilities for Finkelstein & Partners.

9. Over the past 10 years, I have consulted Mr. Altman for his complex litigation expertise in various litigations of my own including a number of class actions and pharmaceutical torts. His firm and mine have co-counseled with each other on complex product liability cases, currently pending in Federal Court.
10. Based upon several detailed discussions with him, I am familiar with the work that Mr. Altman has performed in the above captioned matter. Based upon his knowledge and experience, and my knowledge of what attorneys such as Mr. Altman charge on an hourly basis, it is my opinion that a rate of \$425 per hour is appropriate, if not understated.

I declare under penalties of perjury that the foregoing statement is true and correct to the best of my knowledge.

Dated: December 31, 2010
Santa Rosa, CA

/s Donald Edgar
Donald Edgar, Esq.
Edgar Law Firm
408 College Avenue
Santa Rosa, CA 95401
800-545-6409
don@classattorneys.com

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06 CV 01625 (JSG)

DECLARATION OF
DOUGLAS C. MONSOUR,
ESQ.

I, Doug Monsour, Esq., an attorney licensed to practice in the state of Texas, make the following declaration:

1. I am an attorney licensed in the state of Texas and I am the senior partner of the Monsour Law Firm in Longview, Texas. I primarily practice in the areas of complex mass tort pharmaceutical cases. These cases typically involve millions of pages of documents.
2. I have been asked to provide this declaration in support of the fee application for various attorneys of Finkelstein & Partners of 1279 Route 300, Newburgh, NY 12551.
3. I have known Keith Altman for several years and am familiar with his skills. Most of this time is prior to his becoming licensed as an attorney. However, I have also worked with him since he obtained his law license. I have found him to possess a very high degree of competence with respect to complex litigation and I am particularly familiar with his skills.
4. In 2003, Mr. Altman assisted me in trying two complex pharmaceutical cases against Wyeth involving Diet Drugs in Gilmer, Texas. The nature and quality of his work was that of a

seasoned pharmaceutical attorney aside from his lack of license. He was a very valuable asset to our legal team and was almost a "second chair" for both trials.

5. During that assistance, Mr. Altman educated me on the details of the case and helped me prepare for the direct and cross examination of witnesses. He also assisted me in selecting the key trial exhibits for presentation to the jury. He was also instrumental in helping us respond to the numerous motions that Wyeth's phalanx of lawyers filed.
6. I am familiar with the work that Mr. Altman has performed in the above captioned matter. Based upon his experience and my knowledge of what attorneys such as Mr. Altman charge on an hourly basis, it is my opinion that a rate of \$425 per hour is appropriate. Furthermore, given that the above matter is a civil RICO matter, this fee is also justified as such matters are extremely complex and demanding. I am more than happy to talk to the Court about Mr. Altman's qualifications.

I declare under penalties of perjury that the foregoing statement is true and correct to the best of my knowledge.

Dated: December 28, 2010
Longview, TX



Douglas Monsour, Esq.
Monsour Law Firm
404 N Green St
Longview, Texas 75601
903-758-5757
Doug@monsourlawfirm.com

STATE OF TEXAS

COUNTY OF GREGG

SUBSCRIBED AND SWORN TO BEFORE ME BY Douglas C. Monsour on the 28th day of December, 2010 to certify which witness my hand and seal of office.



Ronda Dickey

Notary Public State of Texas

My Commission Expires 11/19/2014